



August 9, 2002
File No. 75342.00

Ms. Yang Cao, Case Manager
New Jersey Department of Environmental Protection
Bureau of Field Operations
P.O. Box 435
401 East State Street
Trenton, New Jersey 08625-0435



**Re: Response to July 11, 2002 Letter
Unimatic Manufacturing Corp.
25 Sherwood Lane, Fairfield, Essex County, New Jersey
ISRA Case No. E20010335**

65 Willowbrook Blvd.
Wayne
New Jersey 07470
973-256-7800
FAX 973-256-9339
<http://www.gza.net>

Dear Ms. Cao:

GZA GeoEnvironmental, Inc. (GZA) is responding to the New Jersey Department of Environmental Protection (NJDEP) letter dated July 11, 2002 on behalf of its client, Unimatic Manufacturing Corp., regarding the above referenced Site. The NJDEP letter requests clarification on two issues raised during your site inspection of May 16, 2002, eight issues regarding the Preliminary Assessment/Site Investigation (PA/SI) reports, and five issues regarding the Remedial Action Report (RAR). In this letter, GZA addresses these issues in the order that they are presented in your letter, and encloses appropriate backup documentation in response to your requests.

Inspection

1. GZA has located the second production well, and is currently soliciting bids from licensed well drillers to permanently close both wells. Both production wells were used to supply water for Unimatic's manufacturing process.
2. The road base fill was placed as a temporary measure so that the new facility owners could use the rear and side areas prior to the final paving. The base is generally less than one foot thick, although it may be thicker in localized areas where additional leveling was needed.

February 2002 PA/SI

1. The laboratory QA/QC package for the SB samples is attached to this letter.
2. Analyses for volatile organic compounds (VOC) were performed on samples SB-7 and SB-8 only, not on SB-6, SB-9, SB-10, or SB-11. Since the concentrations of Total Petroleum Hydrocarbon (TPHC) from soil sample SB-7 exceeded the 10,000 parts per million (ppm) soil remediation standard, we knew that we were going to



excavate soils from this area regardless of the VOC content in the soils. We ran the two VOC scans mainly for our own information, since we weren't sure of the contents of the suspected underground storage tank (UST) in the area. It turned out that the UST never existed (see enclosed UST/AST Closure Report). A copy of the UST/AST Closure Report was previously sent to the NJDEP, but GZA hereby encloses another copy with this letter for your convenience. We excavated soils from the suspected UST area, including the area where soil samples SB-7 and SB-8 were collected, and sent them off-site to the Model City hazardous waste landfill. Therefore, the method of collection of these VOC samples is a moot point.

3. Soil samples SB-7 and SB-8 were discrete grab samples and were not used for waste characterization. The results of the waste classification analysis are included in the enclosed UST/AST Closure Report. The drummed cuttings from SB-7 and SB-8 were added to the soil pile that was sent to Model City.
4. Both the PA Report and the UST/AST Closure Report (see enclosed) identified the contents of this UST as #2 heating oil. The removal of this UST is documented in the enclosed UST/AST Closure Report.
5. The Tech Regs require the installation of at least four test pits per acre in historic fill areas. The fill area at the Site was less than one acre in size, but GZA installed two additional test pits for delineation purposes. The fill was primarily dirt, not rubble, ash, cinders, or dredge spoils (see NJAC 7:26E-4.6(b)(3)(iii)(1)). GZA collected a sample for laboratory analysis from each of the four required test pits, and analyzed the four samples for TPHC, with a PP+40 analysis on 25 percent, or one of the samples, in accordance with NJAC 7:26E-4.6(b)(3)(iii)(2).
6. As stated in documents introduced in the mediation in the litigation involving the Caldwell Trucking Superfund site, no contaminants were ever introduced into the on-site septic system. No floor drains, sumps, other sinks, or other collection areas were at any time connected to the septic system. The septic tank was last pumped out on March 14, 1980, immediately prior to the Unimatic facility being connected to the municipal sewer system. At that time, the Fairfield Town Engineer inspected the septic tank and found it to be satisfactory. The septic system was never used after that time. Therefore, GZA did not deem an investigation of the septic system to be necessary.
7. GZA's due diligence was unable to identify the existence of written compliance documentation from the USEPA after the March 12, 1982 directive. In response to the directive, Unimatic instituted a program designed to mitigate the release of oil. This reported oil discharge is most likely related to the PCB contamination associated with the former wastewater pipe that GZA has been addressing at the Site. In any event, in 1985, the NJDEP, which by then had assumed the water permitting program from the USEPA, issued a new five-year permit to Unimatic (see attached), indicating

that the Department was satisfied with Unimatic's compliance status regarding wastewater discharges.

8. Voluminous technical data generated in conjunction with the Caldwell Trucking Superfund site demonstrates that discharges from the upgradient Superfund site significantly contaminated the groundwater in the area. All of the contaminants found in GW-1 are consistent with those associated with Caldwell Trucking. Thus, the contaminants detected in GW-1 clearly derive from the upgradient Superfund site.



April 2002 RAR

1. The soil samples documented in the Remedial Action Report (RAR) were all post-excavation samples, and all of the soil sampling depths correspond to the depth of excavation at that location. Portions of the excavation extended to 21 feet below grade, although some portions were excavated to various shallower depths. The excavations were backfilled with certified clean fill.
2. The PCBs were released to the subsurface through the former wastewater pipe emanating from the building. Although no documentation exists, prior to their outlawing in the late 1970s, the PCBs were evidently a constituent of the die casting lubricants that Unimatic utilized to make the aluminum cast molds. GZA submitted a Remedial Investigation Work Plan (RIWP) to the NJDEP on February 19, 2002, and a supplementary RIWP to the NJDEP on June 7, 2002 for the delineation of PCBs in soils on and off the Site.
3. Please reference the attached UST/AST Closure Report for information regarding the location of the removed UST.
4. As discussed in our RIWP dated February 19, 2002, GZA will install four borings on the adjoining property to the north through the sediments of the intermittent creek. GZA is still coordinating this phase of the investigation with the adjoining property owner, and hopes to implement this final phase of the work plan in the next couple of weeks. The discharge ceased when the facility was connected to the municipal sewer system in 1980. At your request, GZA shall perform a Baseline Ecological Evaluation (BEE) of the Site. We will submit the BEE report to the NJDEP by the end of September, 2002.
5. The staged PCB-contaminated soils were removed from the Unimatic site in the first ten days of April 2002. This schedule had been indicated to the NJDEP in GZA's letter dated April 3, 2002.

If you have any questions, please contact me at (973) 256-7800.

Very truly yours,
GZA GeoEnvironmental, Inc.



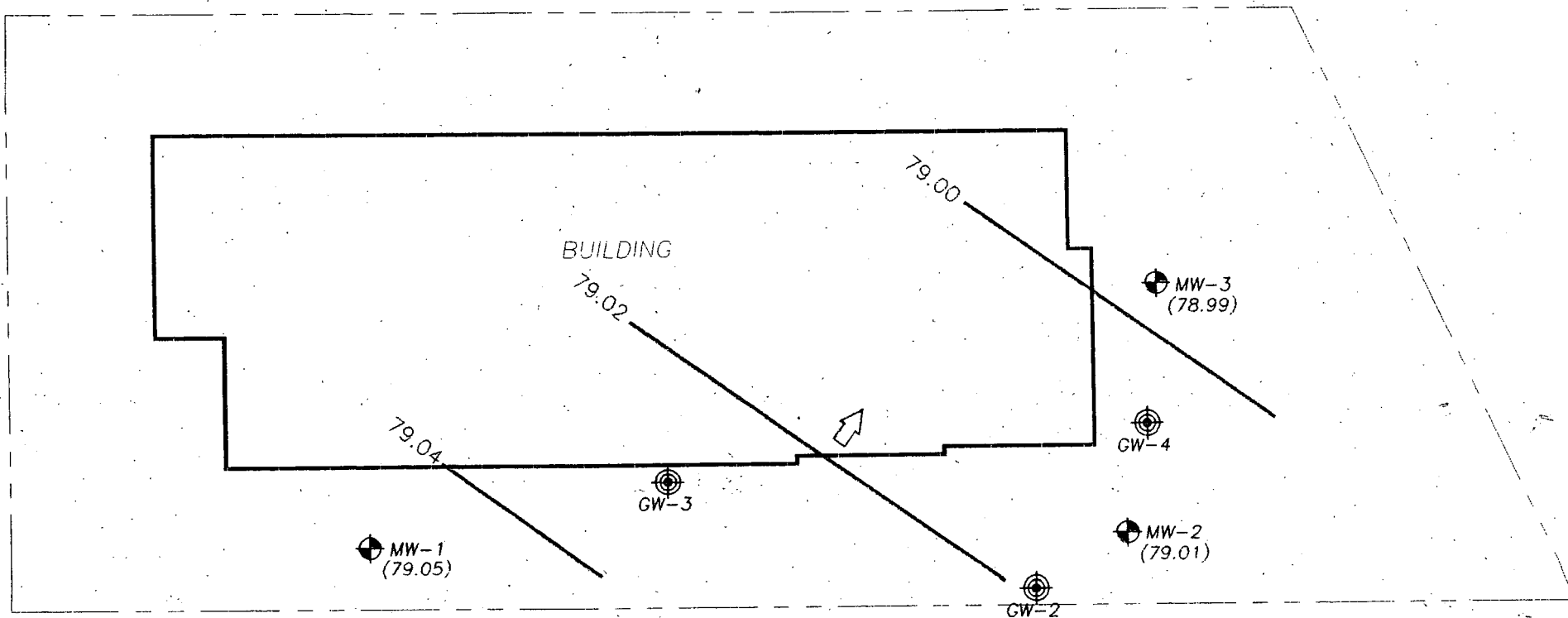
Benjamin Alter, P.G.
Vice President



Enclosures: SI Laboratory QA/QC Package
NJPDES Permit dated August 15, 1985
UST/AST Closure Report

cc: Kathy Smith, Unimatic, w/o attachments
William J. Friedman, Esq., w/o attachments

SHERWOOD LANE



LEGEND

- MW-1 PERMANENT GROUNDWATER MONITORING WELL LOCATION
- GW-2 TEMPORARY GROUNDWATER MONITORING WELL LOCATION
- PROPERTY BOUNDARY
- GROUNDWATER CONTOUR
- PRESUMED DIRECTION OF GROUNDWATER FLOW

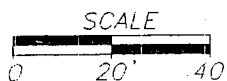

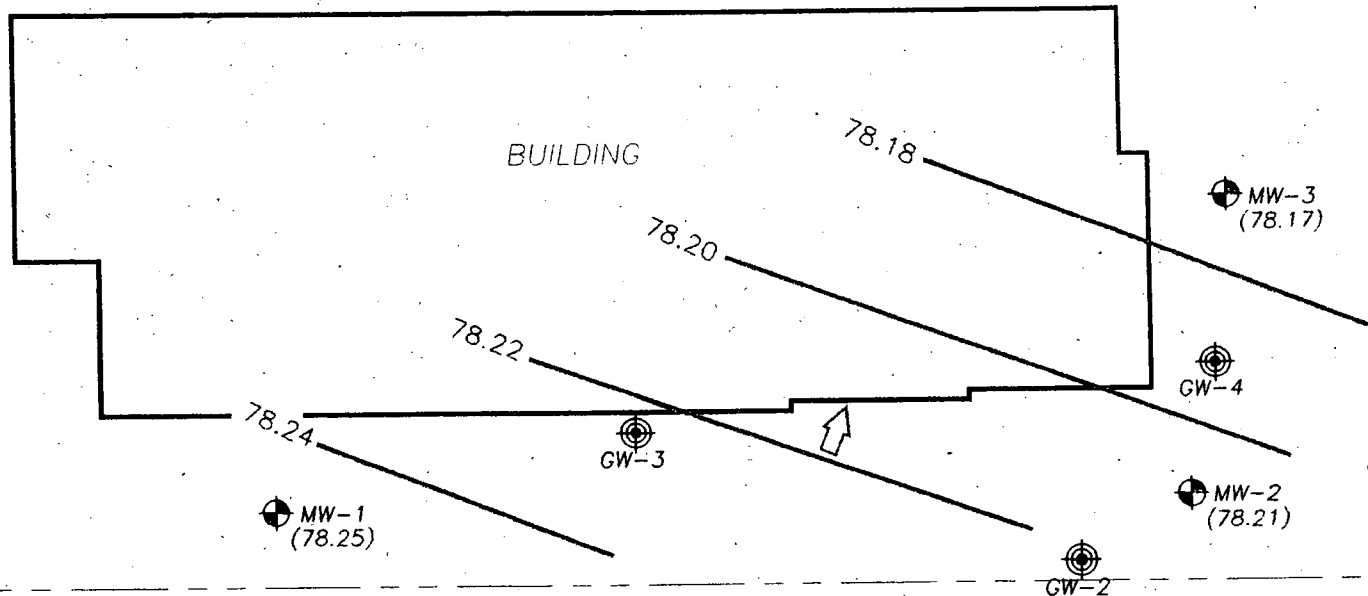


FIGURE NO. 3	PROJECT NO. 75342	Unimatic Manufacturing Company 25 Sherwood Lane (Block 2302, Lot 8) Fairfield, NJ 07004					
		Groundwater Contour Map - July 3, 2002	REV. NO.	DESCRIPTION	BY	DATE	
					PROJECT MGR: B.A. OPERATOR: E.M. DESIGNED BY: C.S. REVIEWED BY: B.A. DATE: 10/22/20		
					 GZA GeoEnvironmental, Inc.		

SHERWOOD LANE



LEGEND

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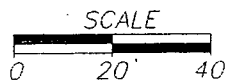


FIGURE NO. 4	PROJECT NO. 75342	Unimatic Manufacturing Company 25 Sherwood Lane (Block 2302, Lot 8) Fairfield, NJ 07004			
		Groundwater Contour Map - August 6, 2002			
		REV. NO.	DESCRIPTION	BY	DATE
			PROJECT MGR: B.A. OPERATOR: E.M. DESIGNED BY: C.S. REVIEWED BY: B.A. DATE: 10/22/200.		

GZA | GZA
GeoEnvironmental, Inc